

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

STEPHANIE LODATI, ET AL.,

Plaintiffs,

V.

FRIENDS ACADEMY, ET AL.,

Defendants.

-X

$$\vdots$$
$$\vdots$$

•

•

•

•

•

$$\vdots$$
$$\vdots$$

•

•

•

▲

Civil Action No.
21-cv-3875 (ENV) (AYS)

**NOTICE OF MOTION TO DISMISS
THE COMPLAINT**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that upon the enclosed Memorandum of Law in Support of Defendants' Friends Academy, The Board of Trustees of Friends Academy, Andrea Kelly, Mark Schoeffel, Carolyn Skudder-Pocius, Jozeph Herceg, Ron Baskind, and Pamela Martocci (collectively, "Defendants") Motion to Dismiss the Amended Complaint, and all pleadings and proceedings heretofore had before this Court, Defendants, by its attorneys Venable LLP, will move this Honorable Court at the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn New York 11201, on a date and time to be designated by the Court, for an Order, pursuant to Federal Rules of Civil Procedure 12(b)(1) and (6), dismissing the Amended Complaint in its entirety, with prejudice, and granting such other relief as the Court deems proper.

Dated: New York, New York
February 18, 2022

/s/ Michael J. Volpe

Michael J. Volpe, Esq.
Doreen S. Martin, Esq.
Emily M. Tortora, Esq.
VENABLE LLP
1270 Avenue of the Americas, 24th Floor
New York, New York 10020
(Tel.) (212) 307-5500
(Fax) (212) 307-5598
mjvolpe@venable.com
dsmartin@venable.com
emtortora@venable.com

Attorneys for Defendants